



CADWALADER, WICKERSHAM & TAFT LLP
Special Counsel to the Debtors
One World Financial Center
New York, NY 10281
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Facsimile: (212) 504-6666
Israel Dahan (ID 6148)

ECF

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

ENRON CORP., et al.,

ENRON POWER MARKETING, INC.,

Appellee-Plaintiff,

-against-

PUBLIC UTILITY DISTRICT NO. 1 OF
SNOHOMISH COUNTY

Appellant-Defendant.

District Court
Case No. 05-CV-2710 (RCC)

Bankruptcy Court
Case No. 01-16034 (AJG)

Adv. Pro. No. 03-2064 (AJG)

FILED
U.S. DISTRICT COURT
2005 APR 27 PM 12:45
S.D. OF N.Y.

NOTICE OF MOTION FOR ADMISSION PRO HAC VICE

PLEASE TAKE NOTICE that upon the annexed declarations of Israel Dahan and Mark C. Ellenberg dated April 21, 2005, plaintiff Enron Power Marketing, Inc. will move before the Honorable Richard C. Casey, United States District Judge, in Courtroom 14C, the Daniel Patrick Moynihan United States Courthouse, the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined, pursuant to Local Rule 1.3 of the United States District Court for the

Southern District of New York for an order admitting Mark C. Ellenberg, Esq. *pro hac vice* in the above captioned matter for purposes of handling all aspects of this matter.

Dated: New York, New York
April 26, 2005

CADWALADER, WICKERSHAM & TAFT LLP

By: 

Israel Dahan (ID 6148)
One World Financial Center
New York, New York 10281
Telephone: (212) 504-6000
Fax: (212) 504-6666

- and -

Mark C. Ellenberg
1201 F Street, NW
Washington, DC 20004
Telephone: (202) 862-2200
Fax: (202) 862-2400

Special Counsel to the Debtors

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PUBLIC UTILITY DISTRICT NO. 1 OF
SNOHOMISH COUNTY

Appellant-Defendant.

DECLARATION OF ISRAEL DAHAN

Pursuant to 28 U.S.C. § 1746, Israel Dahan declares as follows:

1. I am an attorney admitted to practice before this Court and am employed by Cadwalader, Wickersham & Taft LLP, special counsel to Enron Corp. and its affiliated debtors. I submit this declaration in support of plaintiff's motion to admit Mark C. Ellenberg *pro hac vice* before the United States District Court for the Southern District of New York in the above-captioned matter.

2. Mr. Ellenberg is a partner with the firm Cadwalader Wickersham & Taft LLP, is a member in good standing of the Bar of the District of Columbia and is admitted to practice in the United States District Court for the District of Columbia. Mr. Ellenberg agrees to pay the fee of \$25 upon entry of an order admitting him to practice pro hac vice in this case. Mr. Ellenberg's address is: Cadwalader Wickersham & Taft LLP, 1201 F. Street, N.W. Suite 1100, Washington, DC 20004. Mr. Ellenberg's e-mail address is mark.ellenberg@cwt.com and his phone number is (202) 862-2200.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
April 26, 2005



ISRAEL DAHAN (ID 6148)

CADWALADER, WICKERSHAM & TAFT LLP
Special Counsel to the Debtors
One World Financial Center
New York, NY 10281
Telephone: (212) 504-6000
Facsimile: (212) 504-6666
Israel Dahan (ID 6148)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

ENRON CORP., et al.,

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Appellee-Plaintiff,

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Adv. Pro. No. 03-2064 (AJG)

PUBLIC UTILITY DISTRICT NO. 1 OF
SNOHOMISH COUNTY

Appellant-Defendant.

DECLARATION OF MARK C. ELLENBERG

Pursuant to 28 U.S.C. § 1746, Mark C. Ellenberg declares as follows:

1. Attached as Exhibit A is a true and correct copy of a certificate of good standing issued by the United States District of Columbia Court of Appeals.

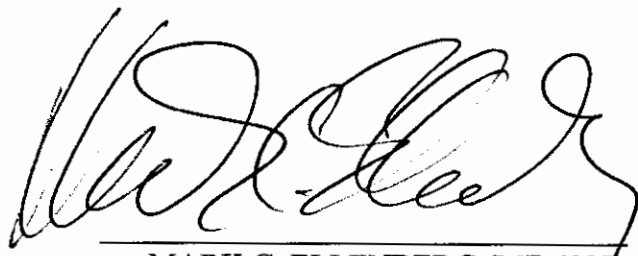
2. I am a partner with the firm Cadwalader Wickersham & Taft LLP, special counsel to Enron Corp. and its affiliated debtors. I submit this declaration in support of plaintiff's motion to admit me *pro hac vice* before the United States District Court for the Southern District of New York in the above-captioned matter.

3. I am a member in good standing of the Bar of the District of Columbia and am admitted to practice in the United States District Court for the District of Columbia. I agree to pay the fee of \$25 upon entry of an order admitting me to practice *pro hac vice* in this case. My address is: Cadwalader Wickersham & Taft LLP, 1201 F. Street, N.W. Suite 1100, Washington, DC 20004. My e-mail address is mark.ellenberg@cwt.com and my phone number is (202) 862-2200.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated:

~~Washington, DC~~
~~New York, New York~~
April 21, 2005



MARK C. ELLENBERG (ME 6927)



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

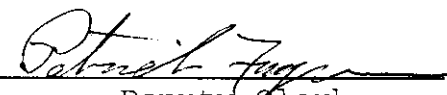
MARK C. ELLENBERG

was on the 25th day of November, 1975,

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on April
20, 2005.

GARLAND PINKSTON, JR.

By: 
Deputy Clerk

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

ENRON CORP., at el,

ENRON POWER MARKETING INC.,

Appellee-Plaintiff,

-against-

PUBLIC UTILITY DISTRICT NO. 1 OF
SNOHOMISH COUNTY,

Appellant-Defendant.

STATE OF NEW YORK:

: ss

COUNTY OF NEW YORK:

Case No. 05-CV-2710 (RCC)

AFFIDAVIT OF SERVICE

Adv. Pro. No. 03-2064

Owens Ridges Jr. being duly sworn, deposes and says:

1. I am not a party to this action, am over 18 years of age and am employed by Cadwalader, Wickersham & Taft LLP, One World Financial Center, New York, New York 10281.

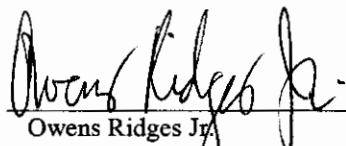
2. On the 26th day of April 2005, I served a true and correct copy of the

- Notice of Motion for Admission Pro Hac Vice

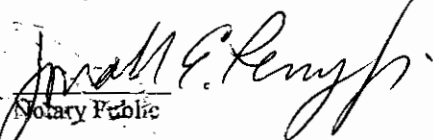
by depositing a true copy thereof enclosed in an official depository under the exclusive care and custody of the U.S.

Postal Service upon:

Alan E. Gamza, Esq.
Moses & Singer
1301 Avenue of the Americas
New York, NY 10019-6076


Owens Ridges Jr.

Sworn to before me on this
26th day of April 2005


Notary Public

JONAH E. PERRY JR.
Notary Public, State of New York
No. 01PE5086103
Qualified in New York County
Certificate Filed in New York County
Commission Expires October 6, 2005